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*Attorneys for Plaintiff ASIS International, Inc.*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA  
SOUTHERN DIVISION

ASIS INTERNATIONAL, INC.,

Plaintiff,

vs.

BOARD OF EXECUTIVE PROTECTION  
PROFESSIONALS, INC.,

Defendant.

Case No. 2:25-cv-00287-RFB-MDC

**STIPULATED DISCOVERY PLAN  
AND SCHEDULING ORDER**

**SUBMITTED IN COMPLIANCE WITH  
LR 26-1(b)**

Plaintiff ASIS International, Inc. ("ASIS") and Defendant Board of Executive Protection Professionals, Inc. ("BEPP" and together with ASIS, the "Parties") by and through their respective counsel, submit this Stipulated Discovery Plan and Scheduling Order as required under Federal Rule of Civil Procedure 26(f) and LR 26-1.

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1 This Scheduling Order is submitted in compliance with LR 26-1(b) and therefore no special  
2 scheduling review is requested.

### 3 **FRCP 26(f) Conference**

4 On March 31, 2025, the Parties met and conferred via Zoom regarding the below  
5 certifications and discovery plan and scheduling order. Attorneys Gettel, Parks, and Moussavi  
6 attended on behalf of ASIS, and Attorneys Zorio, McDougall, and McKissick attended on behalf  
7 of BEPP.

### 8 **FRCP 26(f) Report**

9 **1. What changes should be made in the timing, form, or requirement for**  
10 **disclosures under Rule 26(a), including a statement of when initial disclosures were made or**  
11 **will be made?**

12 Initial disclosures will be made on or before April 14, 2025, which is 14 days after the 26(f)  
13 conference.

14 **2. The subjects on which discovery may be needed, when discovery should be**  
15 **completed, and whether discovery should be conducted in phases or be limited to or focused**  
16 **on particular issues?**

17 The scope of discovery shall be as set forth under FRCP 26(b)(1). The Parties do not believe  
18 that discovery should be conducted in phases or limited to any particular issues at this time.

### 19 **Certifications**

20 **1. Alternative Dispute Resolution.** The Parties discussed the possibility of using  
21 alternative dispute-resolution processes including mediation and arbitration.

22 **2. Alternative Forms of Case Disposition.** The Parties discussed consent to trial by  
23 a magistrate judge under 28 USC 636(c) and FRCP 73 and the use of the Short Trial Program  
24 (General Order 2013-01) and decline to consent to using these procedures at this time.

25 **3. Electronic Evidence.** The Parties discussed whether they intend to present  
26 evidence in electronic format to jurors for the purposes of jury deliberations. The Parties do not  
27 currently intend to present evidence in electronic format to jurors for purposes of jury deliberations  
28

and believe that any such evidence would be compatible with the court's electronic jury evidence display system and have not entered into any stipulations regarding electronic evidence at this time.

### **Discovery Plan and Scheduling Order**

**1. Discovery Cut-Off Date.** On March 11, 2025, BEPP filed its Answer to Complaint [ECF No. 11], and on March 31, 2025, BEPP filed an Amended Answer [ECF No. 17]. The discovery cut-off will be 180 days from the date of BEPP's Answer to Complaint, **September 5, 2025.**<sup>1</sup>

**2. Initial Disclosures.** The Parties agree that the deadline for initial disclosures is **April 14, 2025.**

**3. Amending Pleadings and Adding Parties.** The deadline for filing motions to amend the pleadings or to add parties is 90 days before the close of discovery. These amendments are therefore due on **June 6, 2025.**

**4. FRCP 26(a)(2) Disclosures (Experts).** Expert disclosures must be made 60 days before the discovery cut-off date and rebuttal-expert disclosures must be made 30 days after the initial disclosure of experts. Expert disclosures are due on **July 7, 2025**, and rebuttal-expert disclosures are due on **August 6, 2025.**

**5. Dispositive Motions.** The deadline for filing dispositive motions is 30 days after the discovery cut-off date. Dispositive motions are due on **October 6, 2025.**

**6. Pretrial Order.** The deadline for the joint pretrial order is 30 days after the dispositive motion deadline, **November 5, 2025.** If dispositive motions are filed, the deadline for filing the joint pretrial order will be suspended until 30 days after the decision on the dispositive motions or further court order.

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<sup>1</sup> Where a deadline would fall on a weekend or court holiday, the deadline has been advanced to the preceding business day.

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